Mr. Lester Barancin
Guardian Industries
860 W. US Rt. 6,
Lingonier, IN 46767

Re: **113-11517-00024**
Notice-only change to
MSOP 113-9079-00024

Dear Mr. Barancin:

Guardian Industries has a Minor Source Operation Permit (MSOP 113-9079-00024) under review by OAM for the existing automotive window panel with PVC trim manufacturing operation. A letter notifying the Office of Air Management of the addition of two new adhesive and injection molding press stations was received on November 1, 1999. There will be no increase in maximum capacity or in potential to emit for the rest of the source. This modification has a potential to emit:

(a) greater than or equal to one (1) ton per year but less than ten (10) tons per year of a single hazardous air pollutant (HAP) as defined under Section 112(b) of the CAA or
(b) greater than or equal to two and one-half (2.5) tons per year but less than twenty-five (25) tons per year of any combination of HAPs, and
(c) less than five (5) tons per year of VOC.

Detailed calculations are included in the attached two (2) pages. Pursuant to the provisions of 326 IAC 2-6.1-6(d) the following units will be incorporated into the Minor Source Operation Permit (MSOP 113-9079-00024) currently being processed as notice only:

(a) One (1) adhesive application operation, identified as Adhesive Station No.4, with a maximum capacity of 1,945 pounds per hour of automotive window panels with PVC trim, and exhausting to stack P1.

(b) One (1) Injection Molding Press, identified as Injection Molding Press No.4, with a maximum capacity of 1,945 pounds per hour of automotive window panels with PVC trim, and exhausting fugitively within the building.

(c) One (1) adhesive application operation, identified as Adhesive Station No.5, with a maximum capacity of 1,945 pounds per hour of automotive window panels with PVC trim, and exhausting to stack P1.

(d) One (1) Injection Molding Press, identified as Injection Molding Press No.5, with a maximum capacity of 1,945 pounds per hour of automotive window panels with PVC trim, and exhausting fugitively within the building.

The following conditions shall be applicable:

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuos opacity monitor in a six (6) hour period.

This notice only change has no facilities with potential VOC emissions at, or in excess of 25 tons per year; therefore, 326 IAC 8-1-6 does not apply. No other 326 IAC 8 apply to these emission units at this time. These units will be incorporated into the Minor Source Operation Permit (MSOP 113-9079-00024) currently being processed.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Phillip Ritz, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for extension (3-6878), or dial (973) 575-2555, extension 3241.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments- 2 pages of emission calculations
PR/EVP
cc: File -Noble County
U.S. EPA, Region V
Noble County Health Department
Air Compliance Section Inspector Marc Goldman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

HAP Emission Calculations

Company Name: Guardian Industries Corporation
Address City IN Zip: 860 West U.S. 6, Lingonier, IN 46767
CP: 113-11517-00024
Reviewer: PR/EVP
Date: October 2, 1997

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % MEK	Weight % MIK	Weight % Methyl Methacrylate
PVC Press No. 4							
Adhesive A-1100-B/Catalyst A1167-B	7.19	0.00101	55.000	25.71%	54.05%		0.95%
PVC Press No. 4							
Methy Isobutyl Ketone	6.66	0.00019	55.000			100.00%	
PVC Press No. 5							
Adhesive A-1100-B/Catalyst A1167-B	7.19	0.00101	55.000	25.71%	54.05%		0.95%
PVC Press No. 5							
Methy Isobutyl Ketone	6.66	0.00019	55.000			100.00%	

Material	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	MIK Emissions (ton/yr)	Methyl Methacrylate Emissions (ton/yr)
PVC Press No. 4				
Adhesive A-1100-B/Catalyst A1167-B	0.45	0.94	0.00	0.02
PVC Press No. 4				
Methy Isobutyl Ketone	0.00	0.00	0.30	0.00
PVC Press No. 5				
Adhesive A-1100-B/Catalyst A1167-B	0.45	0.94	0.00	0.02
PVC Press No. 5				
Methy Isobutyl Ketone	0.00	0.00	0.30	0.00
Total State Potential Emissions	**0.90**	**1.88**	**0.59**	**0.03**
				3.41

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Guardian Industries Corporation
Address City IN Zip: 860 West U.S. 6, Lingonier, IN 46767
CP: 113-11517-00024
Reviewer: PR/EVP
Date: October 2, 19

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
PVC Press No. 4																
Adhesive A-1100-B/Catalyst A1167-B	7.19	85.30%	0.0%	85.3%	0.0%	10.25%	0.00101	55.000	6.13	6.13	0.34	8.14	1.49	0.13	59.83	50%
PVC Press No. 4																
Methy Isobutyl Ketone	6.66	100.00%	0.0%	100.0%	0.0%	0.00%	0.00019	55.000	6.66	6.66	0.07	1.63	0.30	0.00	ERR	50%
PVC Press No. 5																
Adhesive A-1100-B/Catalyst A1167-B	7.19	85.30%	0.0%	85.3%	0.0%	10.25%	0.00101	55.000	6.13	6.13	0.34	8.14	1.49	0.13	59.83	50%
PVC Press No. 5																
Methy Isobutyl Ketone	6.66	100.00%	0.0%	100.0%	0.0%	0.00%	0.00019	55.000	6.66	6.66	0.07	1.63	0.30	0.00	ERR	50%
											0.81	19.54	3.57	0.26		

State Potential Emissions

Add worst case coating to all solvents

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
0.00%	0.00%	0.00%	0.00%	**0.81**	**19.54**	**3.57**	**0.26**

Countertops
METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used